

**1190
KEX
RADIO**

**K-NEWS
AM 620**

RECEIVED
APR 27 1998
FCC MAIL ROOM

April 24, 1998

Secretary of the FCC
FCC
1919 M Street NW
Washington, D. C. 20554
202-418-0300
Reference: RM-9208 & RM-9242

We write on behalf of Citicasters, Co. radio stations KEX, KKRZ, KKCW, KEWS, KOPE, and KLOO AM/FM in the state of Oregon. We strongly oppose proposals under consideration by the FCC that would allow low power FM frequencies.

This concept of low power stations with micro-niche programming for minorities, churches, neighborhoods and community groups is well-intentioned, however, this small step would open the door to more problems than it would solve. Allow us to outline briefly our concerns.

Interference from these low powered stations with existing broadcasts could hinder the public safety. The low-powered, not fully-regulated, broadcasters could hinder public safety due to potential interference with aviation, cellular phones and emergency service providers who rely on the radio airwaves. They will also interfere with existing broadcasters. "Legalized pirate" radio will not serve a broader community, but hinder the community already being served.

Existing broadcasters already tremendously serve the greater public. Radio's strength comes from being a mirror of the community. Conservatively, Portland broadcasters alone contribute more than \$10 million each year to local causes that match their formats and the needs of their listeners. From programming, on-air time, cash contributions, and coordination of major community events to special activities, both large and small. Through all of these efforts, the local community is well served.

A couple of examples of how our stations make a difference in the community: KEX provides diagnosis, eyeglasses and hearing aids to over 1,200 children each year in the public school system who fall through the cracks. During the past ten years the station has raised in excess of one million dollars and provided over 10 thousand children with eyeglasses or hearing aids. KKRZ produces a Christmas CD from which the proceeds provides over 500 needy individuals with the Christmas they could never afford.

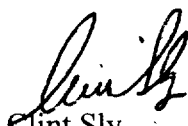
These are two out of hundreds of promotions, fundraisers, and events that touch the community each and every day of the year. Some believe the days of consolidation have effected the broadcaster's commitment to the community. This is untrue. It has only effected the name on the license. Our commitment to providing community-related programming and serving the needs of the community has never been stronger.

Furthermore, if these proposals are adopted, the resulting impact on broadcasters will include:

Permanent amnesty to hundreds of "pirate operators" who have a proven record of arrogant disregard for technical compliance with FCC rules and operating regulations. Creation of a service which will create thousands of new stations without any realistic ability for the FCC to police or regulate these operations. Creation of a category of stations, fully capable of competing with local broadcasters, but with little or no "public interest" obligations otherwise required of conventional broadcast stations. A return to the chaos and calamity imposed on the broadcast industry in the 1980's with the adoption of Docket 80-90, when thousands of new signals flooded the spectrum.

We appreciate this opportunity to express our deep concern about the potential danger of this regulation to our community and our members, whom combined, employ hundreds of people in this market.

Sincerely,



Clint Sly
Co Market Manager



Ron Saito
Co Market Manager

cc: Sen. Ron Wyden
Sen. Gordon Smith

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the matter of)

Proposal for creation of the Low Power FM
(LPFM) Broadcast Service)

FCC RM-9242

REPLY COMMENTS

In late February, J. Rodger Skinner, Jr. submitted a Petition for Rulemaking proposing the creation of a "Low Power FM Broadcast Service". (LPFM) While some of Mr. Skinner's arguments and proposals may not prove practical, I agree with his basic premise that a new broadcast service, allowing for the legal operation of so-called "microbroadcasters", is needed.

NEED FOR LPFM SERVICE

In his petition, Mr. Skinner cites the "Pirate Radio Problem" as one of seven points showing the need for a LPFM service. Commission personnel have publicly estimated the number of illegal low-power FM stations operating in the U.S. as at least 100; others have estimated over 1,000. Legalization is not always the best way to respond to wide violations of a law. But the large number of unlicensed stations (especially in light of well-publicized prosecutions) is certainly evidence of demand for a service.

Mr. Skinner's petition also mentions the Dunifer case in California. In this case, an individual being prosecuted for unlicensed broadcasting alleged that FCC regulations (specifically, the 100 watt minimum power limit for licensed FM stations) were an unnecessary infringement on free speech. A federal judge agreed. To my knowledge, this case has not yet been resolved; there's still a good chance the original decision in Dunifer's favor will be upheld. If this occurs, the Commission will have no choice but to make some provisions for legal broadcasting at lower power levels.

In recent months, the Commission has received applications for experimental authority to operate low-power temporary and/or portable stations at special events. Commission personnel have expressed interest in establishing rules for regular (non-experimental) operation of this kind of station. Such stations have been authorized in Canada and the U.K. for several years without apparent problems; as Mr. Skinner suggests, such stations could be accommodated under LPFM regulations.

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NON-TECHNICAL REGULATIONS FOR LPFM

Mr. Skinner proposes four types of LPFM station. The first, the so-called “talking house”, would continue to be accommodated by Part 15. The second category (“LPFM-3”) would be for temporary stations at special events. A third category (“LPFM-2”) would basically be the legalization of “pirate” stations, at low power and without a minimum operating schedule. Finally, a “LPFM-1” category would be technically similar to current Class A stations but with different ownership regulations.

My opinion is that the proposed scheme is simply too complicated. The Commission’s budget is limited. Accommodating this detailed scheme would require either additional appropriations from Congress (unlikely!), diversion of resources from other programs, or a LPFM license fee so high as to defeat much of the purpose of the service.

Further, I feel the proposed requirement for owners of LPFM-1 stations to reside within 80km of the transmitting antenna is inadequate to accomplish the proposed goal of guaranteeing service to the local community. Many an existing station is controlled by local owners but programmed at a distance, either by satellite feed or by marketing agreement with other stations. Note that no such restriction is proposed for LPFM-2 stations; an out-of-market owner could potentially build (or buy) a chain of these smaller outlets around a city and create a market-wide station.

I propose the creation of one class of LPFM station. A LPFM station would not be licensed to any individual or corporation that owns 25% or more of any other broadcasting station. These ownership restrictions, when combined with the rebroadcast and studio-location regulations below, would prevent the use of multiple LPFMs to create additional “full” stations. They would allow for the temporary special-event stations Mr. Skinner proposes.

All programming on a LPFM would be required to originate from studios within 20km of the transmitting antenna. (Exceptions should be provided for brief newscasts and the “away” sporting events of teams and individuals whose “home” venues are within the 20km limit.) LPFM stations would not be permitted to rebroadcast the signals of any other station. The existing limitations on the broadcast of obscene and indecent material on FM stations would be extended to the LPFM service.

TECHNICAL PARAMETERS OF THE SERVICE

Mr. Skinner’s petition also provides for three different sets of technical parameters for LPFM-1, LPFM-2, and LPFM-3 stations. As with the non-technical regulations, I feel his proposal is too complicated, and I propose only one technical category for LPFM. To fill the gap between Part 15 operations and Class A stations, the minimum power for a LPFM should be 0.1 watt ERP, and the maximum 100 watts ERP. The maximum antenna height above average terrain should be 50 meters.

<u>Class of existing station:</u>	<u>Minimum distance separation:</u>
D, FM translator	20km
A	80km
B1, C3	110km
B, C2	175km
C, C1	250km
TV channel 6 (full-power)	250km
TV channel 6 (LPTV or translator)	40km

The separations from TV channel 6 would apply for all LPFM stations operating on frequencies below 92MHz. In all other cases, the separations would apply for LPFMs on the same channel, or on adjacent channels. In my opinion, Mr. Skinner makes a good case against considering second- and third-adjacent channels in setting minimum distances.

It should be acknowledged that many LPFM applicants will not be engineers, nor will they have the resources to hire engineers. LPFM regulations should accommodate this by allowing applicants to assume their facilities will be legal if they meet certain restrictions. Specifically, a station should be presumed to be legal if the transmitter power is between 0.1 and 10 watts, a directional antenna is not in use, and the antenna is not more than 10 meters above ground. Stations wishing to use higher powers or antennas would be required to calculate their ERP and HAAT.

Concern has been expressed over the possibility of interference from poorly-designed transmitters. The LPFM regulations should (as Mr. Skinner requests) require type-accepted equipment. Experience in the CB and VHF land-mobile services shows that type-accepted transmitters for these power levels and frequencies can be built at a reasonable price. Type acceptance should be conditional on equipment meeting the same requirements for frequency stability and spurious emissions that currently apply to FM translators of the same power.

The original petition doesn't address the Emergency Alerting System, or EAS. The cost of a commercial EAS decoder is beyond the means of most LPFM operators. LPFM stations should be permitted to participate in EAS if they and the responsible local authorities agree. If not, they should be required to monitor the LP-1 station for their area. If the LP-1 transmits the two-tone audible alerting signal, or goes off the air for more than 30 seconds, the LPFM station would be required to suspend operations. LPFM broadcasts could resume once an Emergency Action Termination was issued, or once it was established no Emergency Action Notification had occurred.

ALLOCATION, APPLICATION, AND LICENSING PROCEDURES

The limited resources available to the Commission place severe limits on its ability to arbitrate between competing applicants for mutually-exclusive channels. I believe the only practical way to select licensees is a first-come, first-served basis, with a random lottery for mutually-exclusive applications received on the same day.

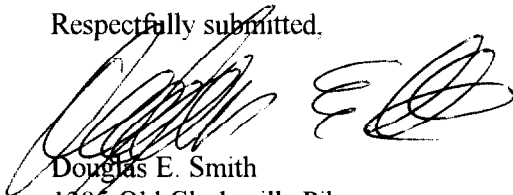
Mr. Skinner's proposals for the application form ("Application Requirements, Processing and Fees") are generally good. The LPFM applicant should be required to show they meet the minimum distance separation requirements from the nearest co-channel and first-adjacent stations. They should be required to show the type of transmitter proposed and the geographical coordinates and height of the transmitting antenna. If the transmitter output exceeds 10 watts or the antenna height exceeds 10 meters, the applicant should also be required to establish the effective radiated power and height above average terrain, as provided under current FCC regulations. The applicant should also be required to provide a telephone number which can be used to shut down the LPFM station if necessary. As suggested by Mr. Skinner, it will be necessary to use a "letter perfect" standard to avoid tying up Commission resources dealing with defective applications.

The LPFM service is directed at individuals and small groups - groups which do not have the large financial resources of most broadcast applicants. It is critical that application and licensing fees be kept as low as possible. If necessary, licensing and renewal fees should be increased to keep any refundable application fee low.

CONCLUSIONS

Mr. Skinner's petition shows the need for a legal low-power radio broadcasting service in the U.S.. The large number of unlicensed stations currently operating in this country confirms the demand for such a service. And the experiences of other countries with low-power community stations confirms that such stations can operate without harm to larger broadcasters or other non-broadcast services. I believe a LPFM service, as proposed by Mr. Skinner and with the modifications I propose, would be a valuable addition to the public interest.

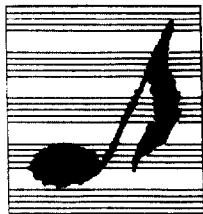
Respectfully submitted,



Douglas E. Smith
1385 Old Clarksville Pike
Pleasant View, TN 37146-8098

21 April, 1998

H A R L A N



COMMUNICATIONS

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APR 27 1998
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April 24, 1998

Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: RM-9208 and RM-9242

Dear Sirs:

I am writing in firm opposition to the proposals referenced above.

Currently, the commercial radio dial is an orderly spectrum generally free from interference. However, I can cite a couple of instances in our region which have played havoc with area stations, including my FM.

A pirate radio station in the Sacramento area was blocking the signals of several stations over a long period of time in 1997 and played havoc with our fringe coverage. A station co-located on our tower, KSXX-FM, was hit hardest. It took some time to shut that pirate down.

On another occasion, just this winter, a pirate station was interfering with FAA transmissions at Sacramento Executive Airport. It was quickly shut down.

In this day and age, commercial stations are for the most part highly responsible and closely regulated with regard to their power and frequency. Even so, the FCC is stretched beyond its limits to be able to deal with interferences from ham radios, pirate stations and other transmissions which disrupt the orderliness of the spectrum.

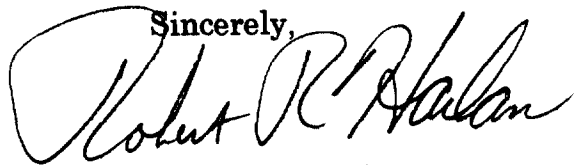
I can see that "neighborhood" type stations, unregulated, could cause major headaches for commercial broadcasters and other "neighborhood" low power broadcasters.

In our market, there is extensive community radio coverage, especially KUBA-AM and KXCL-FM. We are local and for the most part always live. We deal with local issues, local news and support dozens of events from all aspects of the community. We have 30 dedicated employees who place their community first.

We are not alone, as up and down the state we have community-oriented radio station operators in virtually every market.

Please, don't complicate your job and ours. Please vote against RM-9208 and RM-9242.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert R. Harlan". The signature is fluid and cursive, with the first name "Robert" being the most prominent.

Robert R. Harlan
General Manager

RRH:lh

cc: Congressman Vic Fazio

MINNESOTA PUBLIC RADIO



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April 24, 1998

APR 27 1998

FCC MAIL ROOM

Magalie Roman Salas, Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

Dear Ms Salas;

Please accept for informal filing the enclosed Comments on the RM - 9208 (a Petition for Microstation Radio Broadcasting Service), RM 9242 (a Proposal for Creation of the Low Power FM Broadcast Service) and RM - 9246 (a Petition to Establish Event Broadcast Stations).

Respectfully Submitted

Mitzi T Gramling
Associate General Counsel

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
APR 27 1998
FCC MAIL ROOM

In the matter of:

Request to amend the AM and FM service rules
to designate one AM and one FM channel for a
microbroadcast service.

RM - 9208

Proposal for Creation of the Low Power (LPFM)
Broadcast Service

RM - 9242

Proposal for Event Broadcast Stations

RM - 9246

COMMENTS OF

Minnesota Public Radio
45 East Seventh Street
Saint Paul, Minnesota 55101

April 24, 1998

Minnesota Public Radio (MPR) is the nation's leading public radio system with 30 full power stations and 18 translators providing two networks of programming to Minnesota and surrounding regions. MPR serves the entire state with a dual stream of noncommercial broadcasting of classical music and round the clock public news programming. In addition, with national distribution of more than 180 hours of programming weekly, MPR is the largest station-based producer of national programming in the country.

MPR strongly believes that while availability of the airwaves should not be limited only to those with deep pockets, whatever proposals are adopted by the Commission need to assure that good engineering practices are maintained to protect the integrity of existing licensees. For example, any proposal that would weaken or interfere with the Channel 6 protection rules of 47 CFR 73.525, the minimum spacing requirements of the 47 CFR 73.507, the prohibited overlap rules of 47 CFR 73.509, or the translator spacing requirements of 47 CFR 74.1204, would cause disruption and harm to the integrity of the signal of existing licensees. Creating a new class of service that would undermine the integrity of existing classes of services should not be a goal of the Commission.

MPR is experienced in and takes seriously its responsibility to understand and to solve interference problems in many areas of the RF spectrum. In our 32 years of existence, we have successfully dealt with interference problems in the AM, FM, and TV bands, as well as in the microwave and satellite bands. The MPR engineering shop is fully equipped to

make measurements in all of the above bands. In contrast, the petitioners in RM 9208 claim that "(M)any of the technicians in microstation broadcasting will be radio amateurs and other experimenters who will be eager to apply their inventive skills to broadcasting."

MPR is committed to creating and maintaining the cleanest possible RF sites. To that end, we have corrected television interference caused by our transmitter and have installed cavity filters in both our own and other station's high power transmitter plants to prevent intermodulation problems.

MPR is also committed to using type-accepted equipment in its facilities, and to following all of the rules of good engineering practice. It is a practice we believe all responsible broadcasters should follow.

It is our belief that following industry accepted practices and maintaining a clean RF operation, besides being a legal requirement and a good engineering practice, also benefits all broadcasters by creating longer transmitter life, and good relations between broadcasters. And a broadcasting framework that protects the integrity of existing station signals and spectrum is a substantial benefit to the American public.

With an already overextended workload, we are concerned that by authorizing the new proposed class of low power license, the Commission will encounter a fair degree of difficulty in insuring broadcasting excellence and fairness to existing licensees. It is therefore belief that if the Commission decides to adopt a Notice of Proposed Rulemaking in response to any or all of the above petitions, the Commission should carefully craft rules that would require low power broadcasters to maintain all of the spacing, good engineering standards and practices required of all other AM and FM licensees, along with an appropriate strict enforcement mechanisms to ensure that the rules are maintained.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Mitzi Gramling".

Mitzi T Gramling
Associate General Counsel

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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APR 21 1998

FCC MAIL ROOM

In the Matter of)
)
Proposal for Creation of Low Power FM) RM No. 9242
(LPFM) Broadcast Service)

COMMENTS OF THE STATE OF FLORIDA

1. The State of Florida, Bureau of Wireless Communications, submits these comments in response to the Public Notice soliciting comments opposing or supporting the Petition for Rulemaking in the above referenced matter. We believe the establishment of a low power FM (LPFM) broadcast service class and permitting state and local government entities authorization to provide this class of service would enhance our ability to disseminate public safety and public information services to the citizens of our state. We visualize the use of LPFM stations to provide public safety information to tourists visiting our state and as a method of disseminating information at our large state office complexes concerning available services and the location of service providers. We have also proven through test and measurements with our experimental station, WAEM, in Miami, Florida, that LPFM stations can operate on second and third adjacent channels without causing harmful interference to primary commercial FM broadcast stations. The State of Florida has strong interests in this proceeding and recommends the inclusion of state and local governments as authorized licensees for this proposed service.

2. The State of Florida concurs with the need for LPFM stations. The state currently operates an experimental station, WAEM, in Miami, Florida to provide tourist safety information while concurrently studying radio interference between short-spaced second adjacent stations. The station was authorized in May, 1993 following a rash of attacks upon international tourists in the Greater Miami and South Florida area, and began broadcasting in January, 1994. The station broadcasts a voice message via a recorded continual loop in five languages (English, Spanish, Portuguese, French, and German) providing tourists with information on safety practices, safe routes of travel, and locations where tourists would be able to obtain help or information. The Greater Miami Convention and Visitors Bureau (GMCVB) has an agreement with airport car rental agencies such that their rental vehicles are provided with the WAEM radio frequency preselected on their rental vehicles. The station's 60 dBu contour is within five miles radius of the transmitting antenna and is sometimes heard with a sensitive car radio up to distances of ten miles. WAEM exemplifies the public information that state, local governments, and non-profit organizations such as tourist boards could provide under Mr. Skinner's proposed LPFM-1 and LPFM-2 stations. The government or non-profit entity may desire to have the increased proposed coverage offered by a LPFM-1 station

larger metropolitan areas while a LPFM-2 station should provide sufficient coverage for smaller cities, municipalities, neighborhoods, and large office complexes.

3. We believe a useful implementation of the proposed LPFM-2 class station would be to provide public information at some of the State of Florida's large office complexes or park areas. There is currently no mechanism in the FCC Rules to allow either a commercial or non-commercial entity to provide more than a Part 15-type FM transmitter for a contiguous area such as this without applying for a Class A FM radio license. The offices of many of our State Agencies and the State's Emergency Operations Center are located within a 273-acre office complex. We envision a public information radio for this complex that could provide the general public, vendors, and visiting public officials with information on services and activities associated with the state agencies and guide them to the location of these functions. The approximate 200-foot range of a Part 15 type accepted radio will not permit the coverage needed to provide this service. We believe the intent of the Part 15 rules was to limit an entity's transmission to the immediate vicinity of the entity's home or business and to prevent the Part 15 transmissions from causing harmful interference to FCC licensed stations for the general listening public. We, therefore, believe that it is consistent with this perceived intent that an entity should be allowed sufficient signal strength to cover a larger area if the entity is the sole owner and operator of that larger area. Although we recognize the FCC has provisions for travelers information radio in the AM band under Section 90.242 of the FCC Rules, we believe the general public is more likely to use the service if it is provided in the FM band. The public has well adopted the FM signal with its better frequency response and proven noise immunity to weather and electrical noise phenomena.

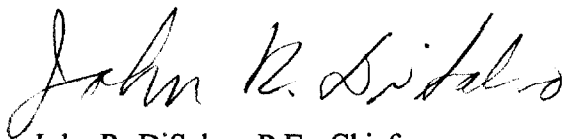
4. As to the potential for interference from second or third adjacent channels, the State of Florida has operated its experimental station, WAEM, on a second adjacent channel, short-spaced basis since May of 1994 without causing or suffering any harmful interference from the second adjacent station. We operate WAEM on 102.3 MHz from a location in Miami that is 12.66 miles distant from the WMXJ-FM commercial radio station transmitting from north Miami-Dade County on 102.7 MHz. Both radio station's antenna systems are vertically polarized. The WAEM antenna's center of radiation is located at a height of 100 meters above sea level with an effective radiated power (ERP) of 25 Watts. The WMXJ facility transmits an ERP of 100 kW with its center of radiation at 307 meters. An engineering study was conducted by Mr. W. J. Kessler of Kessler and Gehman Associates, Inc. to identify the existence of any interference between the signals of WAEM and WMXJ-FM. The tests were conducted using car and portable radio receivers. The study showed that WMXJ-FM could be easily received without interference throughout WAEM's 60 dBu coverage contour. Receiving tests on WMXJ's frequency were conducted at the ground level of the apartment building housing our transmitter and the WMXJ signal was received loud and clear without interference or splatter from WAEM's signal. We did receive interference from WMXJ on the WAEM frequency only when the receiver testing was conducted outside of the WAEM coverage contour. Mr. Roy Pressman, WAEM's maintenance engineer, conducted studies within the building housing our transmitter. He was able to receive the WMXJ signal without any harmful interference in the upper floors of the apartment building. We feel our experience with the WAEM station has shown the ability for two stations with some reasonable distance separation to operate successfully in

the second and third adjacent channels without causing mutual interference to each other. Today's modern receiver equipment offers much greater frequency selectivity and are better able to reject undesired signals. We do, however, recommend an engineering study be accomplished to determine whether minimum distance separation can be eliminated for second and third adjacent stations, as well as the 10.6 and 10.8 MHz offset stations

5. The State of Florida agrees with Mr. Skinner's proposal to require use of type-accepted transmitting equipment to ensure the highest standards of frequency accuracy, frequency deviation, and spectral emission. The requirement for high equipment standards for the proposed new LPFM stations will ensure a greater spectral efficiency for all users and allow accurate prediction and regulation of co-channel and adjacent channel interference levels.

6. In conclusion, the State of Florida strongly supports the proposal to create a new class of low power FM radio stations. We believe that adequate interference protection can be achieved on second and third adjacent channels with the proper adoption of guidelines and have shown this to be the case with our experimental station, WAEM. We believe the implementation of a LPFM radio station allocation will greatly serve the need for the broadcast of public information and community radio. We strongly believe there is a need for this new class of service to be available to state and local entities and suggest our needs should be equally considered in the allocation of frequency spectrum. We urge the Commission toward any and all actions that would enable this new class of radio transmission and provide the State with a greater ability to inform its citizens.

Respectfully submitted,



John R. DiSalvo, P.E., Chief
Bureau of Wireless Communications
Information Technology Program
Department of Management Services
State of Florida

April 24, 1998

JRD:BAM:ldm:Comments on RM No. 9242.doc/LLN 98_179

cc: Governor Lawton Chiles
Joe Belisle, Leibowitz & Associates, P.A.
Mayco Villafana, GMVCB
Linda Nelson, Director, DMS Information Technology Program

Ref RM 9242

as a Senior Cit. stay
home person. we would
enjoy a 24 hr Radio
Station so please give
permission to 24 hr
Spanish Station

Elvira R Briones
3111 Coleman Rd
K C Mo
64111

DOCKET FILE COPY ORIGINAL

5,000 WATTS

NBC AFFILIATE

WGAD
1350AM

DOCKET FILE COPY ORIGINAL

P.O. BOX 1350
720 WALNUT STREET
GADSDEN, AL 35902

(205) 546-1611
FAX (205) 547-0900

April 24, 1998

The Honorable Bob Aderholt
1007 Longworth House Office Bldg.
Washington, D. C. 20505

Dear Bob:

I will soon be retiring. My advanced age is part of it, but a big part of my getting out of the radio business is due to the flooding of the cities and towns of America with radio stations with Docket 80-90.

The F.C.C. has admitted that this was a serious mistake, and have now allowed entities to buy up all the radio stations they want, but not over 50% of the stations in any one market. They allowed this mass ownership because 50% of all stations were losing money, and these consolidations and automation reduced expenses to the degree that most of the stations could continue to operate in a limited fashion.

Now the F.C.C. is considering requests from Pirate radio stations, under the guise of the First Amendment, to flood the marketplace with new, low-power stations.

Thus, our limited number of businesses who buy advertising on radio will be bombarded with many new vendors looking for ways to finance their operations..to the point that they will resist buying ANY radio, or seeing ANY more solicitors. This has already happened, and, with new, low-powered stations reps calling on them it would be impossible.

Furthermore, as competition gets this intense, none of the stations can offer the service to communities that they have come to expect from broadcasters.

HELP! Please use your influence to persuade the F.C.C. to turn down the "pirate" groups who could destroy the best broadcasting system in the world. References are: FCC File Nos. RM-9208 and RM 9242.

Thanks!

Yours truly,



Ed Carrell, Pres. & GM

✓ CC: FCC, Room 222
1919 M Street, N. W., Washington, D.C. 20554

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TagYerit
http://www.tagyerit.com/
rich@tagyerit.com
tel. 413.256.0248

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Wabbit Wecordings
P.O. Box 0823
Amherst, Ma 01004-0823

4/23/98

Office of the Secretary (1800), Room 222, FCC,
1919 M Street NW, Washington, DC 20554.

Concerning several petitions for creation of the low power AM & FM
RM 9208 & RM 9242

I would just like to briefly say that I believe low power radio stations are not only necessitated by commercial stations inability to serve the public interest of only a portion of their audiences, but they are in fact inevitable.

As a musician, I can attest to the proliferation of a variety of recordings released yearly. Estimates for last year are near 30,000. Commercial radio has shown no interest in exploiting the potential of artistic statement. Maybe that's just as well, but there is no logical reason that local stations shouldn't exist to meet the needs of local artists.

There's no reason why communities shouldn't have the ability to discuss their needs on the airwaves, just as they can create local papers. There's no air space for Amherst citizens (my local community) to discuss smoking bans, bar hours, postering, or if a parking garage is what the town needs. This is in spite of the fact we have 2 college stations, one NPR station and many fine commercial stations. The mandate for regional news on WFCR our NPR station reaches a much broader audience, and would have no appeal to these types of issues that concern us here.

How you create it, in terms of technical equipment limitations, and other issues are not my concerns. But I do believe that they should be owned as a public trust, with a local governing board rather than on a "first come" basis. Possibly similar to the way public access television stations exist. The only difference, might be that they could have a commercial value to the community.

Once again I'd like to urge only that you do create a vehicle for low power broadcasting.

Sincerely
Richard Newman



By the way, I tried to gather info from your website, but found Acrobat to be a slow cumbersome means of gathering information. 2 meg files can take 2 hours to download with a 28.8 modem if you're lucky.

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